

IN THE UNITED STATES DISTRICT COURT

FOR THE NORTHERN DISTRICT OF ILLINOIS (EASTERN DIVISION)

TS Merchandising Ltd., a British Virgin
Islands corporation, and TS Production
LLC, a Hungarian limited liability company,

Plaintiffs,

vs.

Dan Hollings, an Arizona resident, and Web
Services, LLC, an Arizona limited liability
company,

Defendants.

Case No. 07 C 6518

**AGREED UPON MOTION FOR
REASSIGNMENT OF RELATED
ACTION**

(Assigned to the Hon. Ronald A.
Guzman)

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ACTION**

Pursuant to Local Rule 40.4 the parties now jointly request that the instant case, TS Merchandising and TS Production LLC v. Dan Hollings and Web Services LLC, Case No. 07 CV 1025 and the later filed case, Dan Hollings v. Rhonda Byrne, TS Production, LLC, The Secret, LLC, TS Holdings, LLC, TS Production Holdings, LLC, TS Merchandising, LLC and Prime Time U.S. Inc., Case No. 08 CV 4369, be designated as related cases and that the later filed case, Dan Hollings v. Rhonda Byrne, et al, Case No. 08 CV 4369, be reassigned to the Honorable Judge Ronald A. Guzman, for the reasons stated below.

In support hereof, the parties state as follows.

1. Plaintiffs filed this action on November 16, 2007, alleging claims against Defendants Dan Hollings and Web Services related to Dan Hollings' work on The Secret's website. Dan Hollings filed suit in the Central District of California against Rhonda Byrne, the creator of The Secret, together with additional defendants which include the Plaintiffs in the instant action, for claims related to his work on The Secret's website. The two cases involve some of the same parties as well as related issues.

2. The parties consented to a transfer of the case to the Northern District of Illinois, which case is now designated Dan Hollings v. Rhonda Byrne, et al, Case No. 08 CV 4369 and pending before the Honorable Judge Gottschall.

3. Discovery as to the merits of either case has not yet begun. As such, the parties believe that there will be no prejudice or delay to either party if this motion is granted.

4. The parties jointly request that the two cases be designated as related cases and that the later case Dan Hollings v. Rhonda Byrne, et al, Case No. 08 CV 4369, be reassigned to Judge Guzman, and that discovery begin and run concurrently in both cases.

5. The parties agree that the consolidation and reassignment of the cases, will result in a more economical disposition of the cases for the parties and the

Court, such that the handling of both cases by the same judge is likely to result in a substantial saving of judicial time and effort.

WHEREFORE, the parties jointly request that the Court enter an order:

- (a) Designating the two cases as related;
- (b) Reassigning case Dan Hollings v. Rhonda Byrne, et al, Case No. 08 CV 4369 to Judge Guzman.

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